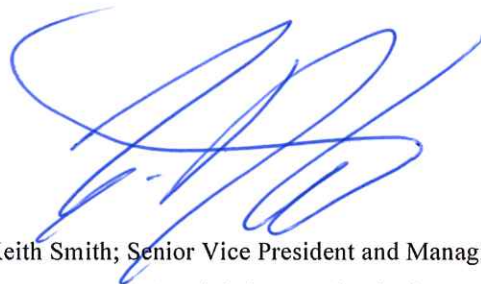


# Modern Day Slavery and Anti-Human Trafficking Statement

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Keith Smith; Senior Vice President and Managing Director,  
DAI Global UK Ltd 18/04/2023

## **I. DAI's Organizational Structure**

DAI Global, LLC is a private development company with corporate offices across four continents, including in Bethesda, Maryland, U.S.A.; London and Apsley, United Kingdom; Brussels, Belgium; Vienna, Austria; Islamabad, Pakistan; and Abuja, Nigeria. DAI's mission is to make a lasting difference in the world by helping people improve their lives. DAI operates worldwide to accomplish this mission and has a strong presence in developing countries including, but not limited to, Central and South Asia, Africa, Central and South America, and the Middle East.

DAI is led by the Global Executive Team (GXT), which is responsible for setting and reinforcing a culture of ethical behavior and compliance. DAI's Global Ethics and Compliance Programme includes safeguarding and is overseen by the Global Ethics and Compliance steering committee, which includes members from the Office of General Counsel, Internal Audit, Contracts, Operations, Human Resources Departments, and others as necessary. DAI's Code of Business Conduct and Ethics was created to inform DAI employees and affiliates regarding areas of human rights violations and to provide guidance on recognizing and handling such violations properly.

## **II. DAI's Policies and Procedures**

DAI is committed to enforcing anti-human trafficking and anti-slavery practices worldwide. DAI will only engage with vendors, suppliers, consultants, subcontractors, grantees, and clients who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. All contracts issued to third-party suppliers, vendors, consultants, and grantees ("contractors") require compliance with the ethical and compliance standard described in DAI's Code of Business Conduct and Ethics. All DAI employees are expected to review and understand the Code of Business Conduct and Ethics to become knowledgeable on identifying and reporting risks of slavery and human trafficking. The Code of Business Conduct and Ethics contains policies on upholding the integrity of our work and reiterates DAI's zero tolerance for modern-day slavery and human trafficking.

All employees and contractors are required to sign an agreement stating that they will adhere to the Code of Business Conduct and Ethics. This encourages employees and associates to report any information received that suggests a violation of the Modern-Day Slavery and Anti-Human Trafficking Policies.

To report unethical behaviour, employees may contact their supervisor, manager, or Chief of Party/Team Leader.

There are many ways to submit a concern or a complaint. Concerns or complaints may be submitted via email ([ethics@dai.com](mailto:ethics@dai.com)); website ([www.dai.ethicspoint.com](http://www.dai.ethicspoint.com)), [DAI Speak Up Line](#) or by telephone (+1-503-597-4328), fax (+1-240-823-2550), or mail (United States: 7600 Wisconsin Avenue, Suite 200, Bethesda, MD 20814, USA; United Kingdom: DAI Europe; 3<sup>rd</sup> Floor Block C Westside; London Road; Apsley; HP3 9TD, Registered in England and Wales No. 1858644).

DAI has a strict non-retaliation policy. DAI will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any person in terms and conditions of employment for making a good-faith report of ethics or compliance concerns.

### **III. Due Diligence**

Because DAI is responsible for complying with requirements from various governments, DAI exercises due diligence on all aspects of its work. DAI considers the nature and the business practices of every party it engages with to ensure that vulnerable workers are not being trafficked or enslaved into filling positions of low or unskilled labour along the supply chain. DAI also includes issues of sexual exploitation in exercising due diligence. DAI always promptly investigates and responds to any allegations or reports of potential violations of human rights.

### **IV. Assessing and Managing Risk**

Supervisors and managers have a special responsibility to lead by example, to establish the expectations for behaviour within the firm, and regularly speak with staff about the importance of ethics to maintain a work environment that is not only knowledgeable about assessing and managing risks, but also conducive to openness in reporting potential violations.

Executives from the Global Executive Team ensure that all employees are trained and meet the ethical standards laid out in DAI's Code of Business Conduct and Ethics. The Global Executive Team monitors risks of supply-chain slavery and human trafficking issues. All members of the Global Executive Team can propose changes needed in policy and practice in order to better assess and manage risk.

DAI adopts a risk-based approach in the assessment of its project activities and supply chain to ensure that it has the means to identify activities and supply tiers that may be at greater risk, which is carried out by a robust due diligence process and entails awareness and reporting training of DAI staff as appropriate.

### **V. Effectiveness of Policies and Procedures**

DAI's primary governing body is the Board of Managers, which oversees DAI's Global Ethics and Compliance Program and ensures the program is appropriate and effective. Most members of the Board of Managers are external to DAI, which allows the Board to have an independent and objective perspective on issues. This ensures that performance incentives, such as utilizing the lowest-cost products or vendors, do not create an increased risk of slavery or human trafficking.

### **VI. Available Training**

DAI requires employees to attend an annual ethics training and provide a written certification that he or she has reviewed, understood, and agrees to comply with DAI's Code of Business Conduct and Ethics. The Code is readily accessible to all at [dai.com](http://dai.com).

DAI strives to build capacities of partners to recognize and respond to all forms of slavery and slavery-type practices including commercial sexual exploitation and forced marriage.

In addition, DAI is taking steps to comply with the Modern Slavery Act by developing awareness on all forms of modern-day slavery and human trafficking through training and internal promotional material. Material used includes first-hand knowledge of the issue, drawn from projects specifically tackling modern-day slavery throughout the world.